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7 THE LANGSDALE LAW FIRM, P.C.

8  
9 UNITED STATES DISTRICT COURT  
10  
11 DISTRICT OF NEVADA

12 STEPHEN LAFORGE and BUNNY  
13 LAFORGE,

14 Plaintiffs,

15 v.

16 RICHLAND HOLDINGS, INC. d/b/a  
17 ACCTCORP OF SOUTHERN NEVADA, a  
18 Nevada Corporation; R.C. WILLEY aka RC  
19 WILLEY FINANCIAL SERVICES,  
RANDALL CORPORATION d/b/a Bowen  
Law Offices; CALEB J. LANGSDALE, ESQ.  
dba The LANGSDALE LAW FIRM, P.C.,

Defendants.

Case No. 2:17-cv-00782-APG-VCF

**FIRST STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR LANGSDALE  
TO RESPOND TO PLAINTIFFS'  
AMENDED COMPLAINT [ECF NO. 71].**

**(FIRST REQUEST)**

Judge: Andrew P. Gordon

20 Defendant The Langsdale Law Firm, P.C. ("Langsdale"), by and through its counsel of  
21 record, Ropers Majeski Kohn & Bentley, and Plaintiffs Stephen Laforge and Bunny Laforge  
22 ("Amended Complaint"), by and through their respective counsel, The Law Offices of Vernon  
23 Nelson, hereby stipulate for the first time to extend the deadline for Langsdale to respond to  
24 Plaintiffs' Amended Complaint:

25 1. On April 30, 2018, this Court issued its Order Denying Plaintiffs' Motion for  
26 Reconsideration Entitled Motion for Clarification. ECF No. 70. The Court ordered that Plaintiffs  
27 must file an amended complaint consistent with its prior order granting Langsdale's Motion to  
28 Dismiss on or before May 10, 2018. ECF No. 70, 13:2-5.

1           2. On Sunday, May 13, 2018, Plaintiffs filed a Motion to Extend Time to File  
2 Amended Complaint. ECF No. 72. That same day, Plaintiffs filed their Amended Complaint. ECF  
3 No. 71. According to Federal Rules of Civil Procedure, Rule 15 and Rule 6, Langsdale must  
4 respond to Plaintiffs' Amended Complaint by Tuesday, May 29, 2018.

5           3. On May 16, 2018, after reviewing Plaintiffs' Amended Complaint, Langsdale  
6 contacted Plaintiffs and the parties started engaging in settlement discussions, attempting to  
7 resolve this matter (and other pending litigation between this parties and before this Court) prior  
8 to Langsdale incurring additional attorney's fees and costs to respond to Plaintiffs' Amended  
9 Complaint. Unfortunately, on May 24, 2018, negotiations were unexpectedly terminated.

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1           4. In light of this, Plaintiffs and Langsdale have stipulated to extend the deadline for  
2 Langsdale to respond to Plaintiffs' Amended Complaint until June 11, 2018.

3           **IT IS SO STIPULATED**

4           Dated: May 29, 2018

5           ROPERS, MAJESKI, KOHN & BENTLEY

6           By: /s/ Timothy J. Lepore

7           STEPHEN J. ERIGERO  
8           TIMOTHY J. LEPORE  
9           Attorneys for Defendant  
10           THE LANGSDALE LAW FIRM, P.C.

11           Dated: May 29, 2018

12           LAW OFFICES OF VERNON NELSON

13           By: /s/ Melissa Ingleby

14           VERNON NELSON  
15           MELISSA INGLEBY  
16           Attorneys for Plaintiffs  
17           STEPHEN LAFORGE AND BUNNY  
18           LAFORGE

19           **IT IS SO ORDERED.**

20             
21           UNITED STATES MAGISTRATE JUDGE

22           DATED: 5-29-2018

## **CERTIFICATE OF SERVICE**

2 In accordance with Rule 5(b) of the Federal Rules of Civil Procedure, and Local Rule IC  
3 4-1(d), I hereby certify that on the 29th day of May 2018, a copy of **FIRST STIPULATION**  
4 **AND ORDER TO EXTEND DEADLINE FOR LANGSDALE TO RESPOND TO**  
5 **PLAINTIFFS' AMENDED COMPLAINT [ECF NO. 71]** was served on all CM/ECF  
6 registered parties by filing and serving the same using the CM/ECF filing system.

/s/ *Timothy J. Lepore*

TIMOTHY J. LEPORE  
An employee of Ropers Majeski Kohn  
& Bentley, P.C.